

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,

Civil Action No. 11-cv-908-SLR-MPT

Plaintiffs,

v.

MOTOROLA MOBILITY, LLC,

Defendant.

**DECLARATION OF MARC BELLOLI
IN SUPPORT OF INTELLECTUAL VENTURES'
OPENING BRIEF ON CLAIM CONSTRUCTION**

I, Marc Belloli, declare as follows:

1. I submit this declaration in connection with Intellectual Ventures' Opening Brief on Claim Construction.
2. I am over the age of 21 years and I am competent to make this declaration. Unless otherwise stated, I submit the following statements based on my own personal knowledge or based on factual investigation I have conducted. If called upon to testify as to the truth of the following statements, I could and would competently testify thereto.
3. I am a partner at Feinberg Day Alberti & Thompson LLP, counsel for Intellectual Ventures I LLC and Intellectual Ventures II LLC.
4. Attached as Exhibit 1 is a true and correct copy of excerpts from the Expert Report of Hugh Smith Regarding Infringement of U.S. Patent No. 7,810,144.
5. Attached as Exhibit 2 is a true and correct copy of excerpts from Randy H. Katz, *Beyond Third Generation Telecommunications Architectures: The Convergence of Internet Technology and Cellular Telephony*.

6. Attached as Exhibit 3 is a true and correct copy of excerpts from IEEE Standard Dictionary of Electrical and Electronics Terms,” IEEE Std. 100-1996, Sixth Edition, 1996.

7. Attached as Exhibit 4 is a true and correct copy of excerpts from the Expert Report of Donald Alper, Ph.D. Concerning Infringement of U.S. Patent No. 7,120,462.

8. Attached as Exhibit 5 is a true and correct copy of excerpts from the Expert Report of Dr. Timothy J. Drabik Regarding the Invalidity of U.S. Patent Number 7,120,462.

9. Attached as Exhibit 6 is a true and correct copy of excerpts from the June 28, 2013 deposition of Timothy J. Drabik.

10. Attached as Exhibit 7 is a true and correct copy of excerpts from U.S. Patent No. 5,625,673.

11. Attached as Exhibit 8 is a true and correct copy of excerpts from the Expert Report of Donald J. Alpert, Ph.D. Concerning Validity of U.S. Patent No. 7,120,462.

12. Attached as Exhibit 9 is a true and correct copy of excerpts from U.S. Patent No. 7,103,380.

13. Attached as Exhibit 10 is a true and correct copy of excerpts from U.S. Patent No. 6,157,545.

14. Attached as Exhibit 11 is a true and correct copy of excerpts from U.S. Patent App. Pub. US2012/0170204.

15. Attached as Exhibit 12 is a true and correct copy of excerpts from the prosecution history of patents related to the ’462 patent.

16. Attached as Exhibit 13 is a true and correct copy of excerpts from the Action Closing Prosecution in the *inter partes* reexamination for the ’462 patent.

17. Attached as Exhibit 14 is a true and correct copy of excerpts from the July 17, 2013 deposition of Randy H. Katz.

18. Attached as Exhibit 15 is a true and correct copy of excerpts from “Merriam Webster's Collegiate® Dictionary,” Tenth Edition, 1997.

19. Attached as Exhibit 16 is a true and correct copy of excerpts from U.S. Patent D346,797.

20. Attached as Exhibit 17 is a true and correct copy of excerpts from U.S. Patent D488,455.

21. Attached as Exhibit 18 is a true and correct copy of excerpts from U.S. Patent D343,173.

22. Attached as Exhibit 19 is a true and correct copy of excerpts from U.S. Patent D354,062.

23. Attached as Exhibit 20 is a true and correct copy of excerpts from “Microsoft Computer Dictionary,” Fourth Edition, 1997.

24. Attached as Exhibit 21 is a true and correct copy of excerpts from the Expert Report of Darran Cairns Regarding Infringement of U.S. Patent No. 6,412,953.

25. Attached as Exhibit 22 is a true and correct copy of excerpts from the Expert Report of Dr. Timothy Drabik Regarding The Question of Validity of U.S. Patent No. 6,412,953.

26. Attached as Exhibit 23 is a true and correct copy of the Declaration of Darran Cairns Regarding U.S. Patent No. 6,412,953.

27. Attached as Exhibit 24 is a true and correct copy of excerpts from the Expert Report of Jason Nieh Regarding Infringement of U.S. Patent Nos. 6,557,054 and 6,658,464.

28. Attached as Exhibit 25 is a true and correct copy of a July 23, 2013 email from Steve Moore to Marc Belloli, et al.

29. Attached as Exhibit 26 is a true and correct copy of excerpts from the Expert Report of Dr. Brian Von Herzen Regarding the Non-Infringement of U.S. Patent Nos. 6,557,054 and 6,658,464.

30. Attached as Exhibit 27 is a true and correct copy of excerpts from the file history of a patent related to the '464 patent.

31. Attached as Exhibit 28 is a true and correct copy of excerpts from the McGraw-Hill Dictionary of Scientific and Technical Terms, Fifth Ed., 1994.

32. Attached as Exhibit 29 is a true and correct copy of excerpts from the December 20, 2012, deposition of Richard Reisman.

33. Attached as Exhibit 30 is a true and correct copy of excerpts from the American Heritage Dictionary, Second College Ed., 1991.

34. Attached as Exhibit 31 is a true and correct copy of excerpts from the Expert Report of Jerry D. Gibson, Ph.D. Regarding Infringement of U.S. Patent No. 7,409,450.

35. Attached as Exhibit 32 is a true and correct copy of excerpts from the Order Denying Request for Inter Partes Reexamination for the '450 patent.

36. Attached as Exhibit 33 is a true and correct copy of excerpts from the Decision on Petition Under 37 C.F.R. 1.181 & 1.927 concerning the *inter partes* reexamination request for the '450 patent.

37. Attached as Exhibit 34 is a true and correct copy of Motorola's initial construction of "wireless bandwidth."

38. Attached as Exhibit 35 is a true and correct copy of excerpts from the July 17, 2013, deposition of Randy H. Katz.

39. Attached as Exhibit 36 is a true and correct copy of excerpts from the Expert Report of Jerry D. Gibson, Ph.D. Regarding Validity of U.S. Patent No. 7,409,450.

40. Attached as Exhibit 37 is a true and correct copy of excerpts from the file history of U.S. Patent No. 6,862,622.

41. Attached as Exhibit 38 is a true and correct copy of excerpts from the file history of U.S. Patent No. 6,862,622.

42. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Menlo Park, California
on this 26th day of July, 2013

/s/ Marc Belloli

Marc Belloli